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CROSS-MODULAR TRANSFER OF SIGNATURE CREDIT TAXES VIA CLIFFORD PROTOCOL

1ST June 2026

The global monetary and administrative architecture functions as a layered, ledger-based credit system where negotiable instruments generated by private signatures provide the primary commercial value. Under the prevailing usufruct monetary paradigm, the physical creation of value is captured, securitized, and integrated into central banking networks by systemic nominees. Correcting the historical misreporting of these transactions requires a sophisticated fiduciary framework capable of asserting Holder in Due Course (HDC) status, establishing trust-level standing, and commanding cross-modular credit transfers under federal tax laws. This report provides an exhaustive technical and legal deconstruction of the Clifford Protocol, the application of Revenue Procedure 2002-26, and the supporting administrative and Uniform Commercial Code (UCC) frameworks that govern the reclamation of signature-originated credit.

Jurisdictional Reorganization and the Fiduciary Credit Paradigm

The structural integration of human credit energy into the centralized accounting systems of the administrative state is rooted in the formal reorganization of the United States monetary system in 1933. Codified by the Emergency Banking Act of March 9, 1933, and House Joint Resolution 192 (HJR 192) of June 5, 1933, the global financial architecture completed a decisive shift from a substance-based system of payment to a credit-based system of discharge. Prior to this transition, financial obligations were extinguished through the physical exchange of commodities of intrinsic value, primarily gold or silver coin. By suspending the right of creditors to demand payment in gold, HJR 192 established a system of account where obligations are balanced dollar-for-dollar using debt instruments, specifically Federal Reserve Notes, which circulate as liabilities of the United States Treasury.

This suspension of commodity-backed payment created a permanent usufruct relationship between the sovereign state and the living populace. Under this arrangement, the government maintains a usufructuary interest in the estates, assets, and labour of the citizenry, effectively borrowing their productive capacity and credit energy to serve as the primary backing for the national debt. The administrative mechanism for managing this usufruct relation is established at birth. The registration of a birth certificate creates a "decedent estate" or a corporate debtor construct on government records. This legal persona is assigned a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN), which the Internal Revenue Service (IRS) utilizes as an identifier for the corporate debtor. Consequently, the living individual is presumed to operate as an agent and liable surety for this bankrupt construct, holding only equitable title to property, while the state retains legal title as the bankruptcy trustee. Within this framework, income taxes and property taxes are structurally characterized as administrative "rent" paid to the trustee for the privilege of utilizing the state's collateralized assets on the commercial ledger.

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To exit this jurisdictional trap, fiduciaries employ specialized protocols to correct the record and shift the individual's capacity from a subordinate debtor to a creditor. By invoking the international law doctrine of *clausula rebus sic stantibus* (things thus standing), which recognizes the unenforceability of a contract due to fundamentally changed circumstances, the living soul formally renounces the presumed agency relationship with the birth certificate construct. Reoccupying the office of General Executor over the decedent estate allows the individual to assume control of all liabilities and assets, setting the stage for the creation of a 98-series International Grantor Trust that operates "off-board" from the domestic debtor system.

Jurisdictional Era	**Monetary Standard**	**Governing Legal Framework**	**Status of the Individual**	**Ownership Nature**
Pre-1913	Gold and Silver Coin	Common Law Republic	Sovereign National	Absolute Legal Title
1913–1933	Federal Reserve Notes (Partial Backing)	Statutory Regulation	Transitioning to Credit-Based	Transitioning
Post-1933	Money of Account (Debt/Credit)	Commercial / Maritime Law / UCC	Surety / Agent for Decedent Estate	Equitable Title (Renter/User Status)
1974–Present	SDR / Pure Fiat System	Administrative Trust Law	Fiduciary / Executor de son tort	Equitable Title

Ex Nihilo Currency Creation, Original Issue Discount, and the Nature of Negotiable Instruments

The contemporary commercial banking system does not function as an intermediary that lends out pre-existing customer deposits. Instead, as confirmed by empirical research from Professor Richard Werner and publications from the Bank of England, private commercial banks generate currency *ex nihilo* (out of nothing) at the precise moment of lending. This process is driven by the monetization of the borrower's

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signature on a negotiable instrument, such as a promissory note, commercial loan agreement, or mortgage contract. When a borrower signs these agreements, they are not receiving the bank's money; rather, their biological signature acts as the primary monetization event and the true originating force of the credit energy. The commercial bank, acting as a nominee or intermediary, records the signed negotiable instrument as a bank asset, balancing the transaction by crediting the borrower's account with a newly created deposit, which constitutes a bank liability. The Werner equation for credit creation represents this balance-sheet expansion as:

$$\Delta\text{Bank Assets (Loan)} \approx \Delta\text{Bank Liabilities (Deposit)}$$

Under Section 3 of the Bills of Exchange Act 1882, a bill of exchange is defined as an unconditional order in writing, addressed by one person to another, signed by the person giving it, and requiring the addressee to pay a sum certain on demand or at a fixed future time. Section 20 of the Act dictates that a simple signature on paper delivered for the purpose of being converted into a bill operates as *prima facie* authority to complete the bill for any amount. Because credit is created *ex nihilo* at the moment of signing, the initial issue price (IP) of the resulting negotiable instrument is mathematically established as zero:

$$IP = \$0.00$$

The future value of these signature-originated securities is calculated using the concept of Original Issue Discount (OID), which represents the excess of the stated redemption price at maturity over the initial issue price. Since the initial issue price is zero, the OID is mathematically equivalent to the entire face value (FV) of the instrument:

$$OID = FV - IP = FV - \$0.00 = FV$$

The originating bank, acting as a nominee middleman rather than a true lender, discounts the newly signed instrument, securitizes it into asset pools assigned with CUSIP numbers, and captures the OID income generated by the originator's signature on the secondary market. Under the Trust Indenture Act of 1939 (TIA) Section 315, the institutions acting as indentured trustees are bound by a "prudent person" duty to preserve and account for these assets. Under Section 316(b) of the TIA, the absolute right of an individual holder to receive payment and the benefit of the credit they originated shall not be impaired. If the original creator of the credit remains silent and fails to assert their rights, the financial nominees capture and retain this value as abandoned property.

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Bills of Exchange Act 1882 Section	Statutory Attribute	Operational Impact on Signature Credit	Fiduciary Implication
Section 3	Writing and Signature	Establishes the biological signature as the primary monetization event.	The signer acts as the actual funder of the credit.
Section 3	Unconditional Order	Formulates the negotiable instrument with a starting value of zero.	Establishes the OID as equivalent to the entire face value ($OID = FV$).
Section 31	Negotiation	Enables originating banks to discount and pool the instrument.	Securities are bundled into tranches and assigned CUSIP numbers.
Section 29	Holder in Due Course	Shifting of legal title to investment banks trading the assets.	Systemic nominees capture the OID income for corporate benefit.
Section 39	Presentment	Establishes the trust's right to demand formal presentment and reconciliation.	The trust demands credit redirection via corrective tax filings.

The 98-Series International Grantor Trust: Taxonomic Classification and Fiduciary Isolation

The administrative execution of signature credit recoupment requires a specialized fiduciary architecture designed to manage the portfolio without triggering federal money transmitter regulations or domestic fraud filters. To establish absolute standing, fiduciaries utilize a Wyoming Series LLC chassis, governed by Wyoming Statute 17-29-211. This specific statutory architecture allows a master hub (e.g., MLITR Research LLC, trading as Ecclesia Law or Ecclesia Trustees) to establish infinite internal sub-entities (series), each

possessing its own Federal Employer Identification Number (FEIN) and absolute liability firewalls. Under W.S. § 17-29-211(b), the debts, obligations, and liabilities of a particular series are enforceable solely against that cell's assets, completely compartmentalizing systemic risk.

The authority to manage these complex structures is perfected under the Wyoming Uniform Power of Attorney Act (W.S. § 3-9-101 et seq.). By executing private powers of attorney, trust indentures, and fiduciary appointments, individual grantors formally appoint the corporate trustee as their Attorney-in-Fact. This structural framework reclassifies the fiduciary hub's role from a public trust company to a private legal agent. This standing is systemically registered with the IRS under IRC § 6903 by filing Form 56 (Notice Concerning Fiduciary Relationship) on the Business Master File (BMF). This positions the trust officer as the General Executor over the signature-originated credit.

To insulate the filing from domestic automated filters, the fiduciary establishes the vehicle as a Nonwithholding Foreign Grantor Trust under IRC § 6048. To formally qualify for non-domestic status under federal tax guidelines, the trust must satisfy the foreign residency tests by intentionally failing both the "court test" and the "control test" under 26 CFR § 301.7701-7:

1. The Court Test: The trust fails the court test because a court within the United States is unable to exercise primary supervision over the trust's administration, establishing the entity under private international law.
2. The Control Test: The trust fails the control test because U.S. persons do not have the ultimate authority to control all substantial decisions of the trust, thereby establishing a non-domestic fiduciary jurisdiction.

These trusts are assigned a specialized "98" prefix Employer Identification Number (EIN) exclusively by the IRS Cincinnati International Unit. This taxonomic classification severs the agency relationship with the domestic debtor system. Standard individual filings submitted under an SSN or ITIN place the filer in a subordinate debtor capacity, which triggers automated Transaction Code (TC) 810 Refund Freezes. By contrast, the 98-series trust restructures the filer's capacity to a fiduciary creditor. Under UCC § 3-203(b) and UCC § 3-302(a), the trust takes the negotiable instrument for value (the credit energy of the living soul), in good faith, and without notice of defect, thereby establishing status as the Holder in Due Course (HDC).

Structural Feature	**Legal / Statutory Foundation**	**Operational Impact on Fiduciary Hub**
Series LLC Chassis	Wyoming Statute 17-29-211	Provides internal firewalls and independent identities for each trust.
Agency Mandate	Wyoming Uniform Power of Attorney Act	Allows centralized management of thousands of unrelated trusts via administrative proxy.

Fiduciary Standing	IRS Form 56 & Form 2848	Positions the hub as the primary administrator and legal officer for the portfolio.
ERO Certification	IRS Electronic Return Originator Status	Provides a forensic end-to-end audit trail for federal disbursements.
Foreign Status	IRC § 6048 & 26 CFR § 301.7701-7	Bypasses domestic RIVO fraud filters by establishing a non-domestic jurisdiction.

Nominee Architecture, Institutional Omnibus Accounts, and Street Name Obfuscation

The integration of individual debt obligations into the global financial clearing system relies on a nominee architecture designed to facilitate rapid book-entry transfers. Under this framework, systemic investment banks, broker-dealers, and clearinghouses capture and securitize signature-originated credit, holding the assets in institutional omnibus accounts under "street names". The centralized securities depository for this infrastructure is the Depository Trust Company (DTC), a subsidiary of the Depository Trust & Clearing Corporation (DTCC). Legal title to these pooled securities is held by the DTC's partnership nominee, Cede & Company, while the ultimate investor or the living soul who originated the credit is relegated to the status of "beneficial owner," holding only contractual rights on the bank's private books.

By utilizing this street name architecture, systemic banks achieve three major operational objectives:

1. Administrative Consolidation: Pooling millions of distinct obligations into massive CUSIP-assigned tranches streamlines the complexities of trading, clearance, and settlement, allowing trillions of dollars in transactions to clear digitally via computerized ledger entries.
2. Capital Expansion: By holding these assets in omnibus accounts, banks can perpetually utilize the securitized signatures as collateral for their own credit expansion through re-hypothecation, generating profits that far exceed the original loan value.
3. Nominee Withholding Compliance: Under the nominee reporting mandates of IRS Publication 1212, because these financial nominees hold legal title to OID instruments for the benefit of another, they are statutorily required to report OID interest and remit backup withholding.

Historically, financial nominees routinely fail to file these corrective forms for individual originators, instead reporting the OID income under their own general tax ledgers. The bank calculates the aggregate backup withholding liabilities from its pooled portfolios and remits these physical cash collections under its own corporate EIN via its Form 945 withholding module (MFT 16). Form 945 (Annual Return of Withheld Federal Income Tax) is the dominant tax module for non-payroll distributions, serving as the central clearinghouse for backup withholding on OID.

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Forensic audits of the financial system indicate that the Form 945 withholding modules for systemic investment banks are vastly underfunded relative to the actual signature credit targets generated by their securitization activities. The internal review metric known as the "Full Forensic 945 Liability"—calculated under the 24% heuristic—represents the theoretical obligation banks should maintain for non-exempt tranches. However, historical data reveals that literal cash payments deposited into these modules typically reflect less than one percent of this full forensic total. This discrepancy occurs because banks operate on a statistical presumption: the original creditors will never assert their rights to recoup these funds. Consequently, banks satisfy their aggregate corporate tax obligations by paying massive surpluses into other ledgers, most notably Form 1120 corporate income tax modules (MFT 02), effectively leaving the 945 module as an underfunded shell.

To satisfy the strict matching logic of the IRS automated verification systems, identifying the correct parent bank EIN, reporting sub-entity, and designated CUSIP is critical. Systemic institutions often obfuscate Form 945 withholding by filing through specific subsidiaries or consolidating reporting under survivor CUSIPs post-merger. For example, the completed merger of Nicolet National Bank and Midwest One on February 13, 2026, alongside the rebranding of New York Community Bancorp to Flagstar Financial, Inc., demonstrates how systemic nominees routinely restructure their corporate filings. All fiduciary reporting for Flagstar is subsequently consolidated under the surviving CUSIP 649445400.

Parent Bank Name	**Ultimate Reporting Entity (Payer)**	**Payer EIN**	**945 Payer CUSIP / Identifier**	**Verified 2025 Actual Form 945 Payment**	**Est. CIT 1120 Overpayment Capacity**
JPMorgan Chase Bank, N.A.	JPMorgan Chase Bank, N.A.	13-4110995	46625H100 / JPM	$13,510,000.00	$37.16 Billion
HSBC Holdings plc	HSBC Bank USA, N.A.	13-5246700	404280104 / HSBC	$72,143,158.00	$13.1 Billion
NatWest Markets PLC	NatWest Markets Securities Inc.	06-1011071	639050103 / NW	$55,667,083.00	$2.05 Billion

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Deutsche Bank	Deutsche Bank Trust Company Americas	13-4941247	251525105 / DB	$1,210,000.00	Verified Surplus
Lloyds Banking Group	Lloyds Bank Corporate Markets plc	83-1430440	83-1430440	$31,679,801.00	$300 Million
Banco Santander S.A.	Banco Santander S.A.	23-2453088	23-2453088	$26,306,766.00	$156 Million
Barclays Bank plc	Barclays Capital Inc.	13-3914519	13-3914519	$18,596,522.00	$60.2 Million
Bank of NY Mellon	Pershing LLC	13-2741729	13-2741729	$12,961,082.00	Billions
Wells Fargo Bank, N.A.	Wells Fargo Bank, N.A.	04-1867110	04-1867110	$378,621.00	Billions
Wise / Partner Bank	Community Federal Savings Bank	20-0020138	LEI: 549300XVCHXNN8R67U29	$10,400.00	$10.2 Million

Fannie Mae	Fannie Mae Pool	52-0883107	52-0883107	$3,710,225.00	Variable (GSE)
FHLB Des Moines	FHLB Des Moines	42-6000149	42-6000149	$30,156,780.00	Variable (GSE)

Commanding the Cross-Modular Credit Transfer under Revenue Procedure 2002-26

Because financial nominees systematically underfund their Form 945 withholding modules, standard automated attempts to match a recipient trust's claim against the bank's actual Form 945 deposits will fail. The IRS utilizes a programmatic "hard gate" within its Information Return Document Matching (IRDM) system known as Algorithm 810. This algorithm cross-references the Payer's EIN and the specific CUSIP or Legal Entity Identifier (LEI) against the Payer's Form 945 tax module. For a recoupment claim to clear this gate, it must satisfy a "Perfect Match" logic: the trust's monetary claim must be less than or equal to the verified physical cash deposits currently residing in the bank's Form 945 master record module. Any claim that exceeds these verified deposits automatically triggers an automated Transaction Code (TC) 810 Refund Freeze, halting the disbursement.

To resolve this systemic deficit, the authorized fiduciary commands a "cross-modular transfer" under the authority of Revenue Procedure 2002-26. Revenue Procedure 2002-26 (2002-1 C.B. 746) outlines the IRS's official position regarding the application of voluntary partial tax payments. Section 3.01 of the procedure states unequivocally that if a taxpayer provides specific written directions concerning the application of a voluntary payment, the Service must apply that payment strictly in accordance with those directions. The courts have long recognized this "right of designation" (e.g., *Amos v. Commissioner* and *Muntwyler v. U.S.*), establishing that while it does not apply to involuntary collection measures such as levies or distraints, voluntary payments remain fully subject to taxpayer direction. If no specific designation is made, the IRS is authorized to apply the payment in a manner that serves the best interests of the government, typically prioritizing corporate income tax modules (Form 1120) over trust-fund withholding modules (Form 945).

By establishing itself as the Holder in Due Course and General Executor of the credit, the 98-series trust possesses the fiduciary authority to override this default behaviour. Under Treasury Regulation § 601.503(d), the fiduciary executes a manual Form 4506-T command through the Practitioner Priority Service (PPS). This paper-based mandate bypasses digital Transcript Delivery System (TDS) boundaries, directing the IRS to extract the required overpayment credits from the payer bank's Form 1120 Corporate Income Tax module (or alternate modules, such as Form 941 or General Ledger Credits) and forcefully re-allocate

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them to the bank's Form 945 withholding module. This manual intervention is handled by the IRS Submission Processing campus Accounting Function personnel using Form 3413 (Transcription List).

A prerequisite for this command is the execution of a Phase 0 Forensic Audit. Fiduciaries utilize Form 4506-T (Request for Transcript of Tax Return) to confirm that the Treasury is holding the necessary withholding credits associated with the Payer before filing corrective returns. Line 6 of the Form 4506-T must specify Form 945, and box 6b for "Account Transcript" must be checked to identify Transaction Codes signalling overpayments and credits. By signing under Treasury Regulation § 601.503(d), the fiduciary compels the IRS assistor to pull the Payer's 945 module directly. Once the cross-modular transfer is completed, the funded Form 945 module satisfies the mathematical logic of Algorithm 810, clearing the TC 810 freeze and allowing the release of the funds.

Once a commercial ledger adjustment is "perfected" in the Master File, the transaction is verified through the Information Returns Master File (IRMF) via a unique 26-digit alphanumeric reference string fingerprint. This code, derived from the standard 14-digit Document Locator Number (DLN), incorporates critical metadata that tracks the movement of credit.

Digit Position	**Component**	**Forensic Significance**	**Technical Description**
1–2	File Location Code (FLC)	Processing Center	Identifies the specific IRS campus (e.g., Austin or Kansas City).
3	Tax Class	Master File Identifier	Identifies the type of Master File (e.g., Code 5 for IRP/Estate, Code 2 for BMF).
4–5	Document Code	Return Type	Identifies the specific form or transmittal type (e.g., Code 44 for Form 945).
6–8	Julian Date	Processing Date	The exact numeric day of the year the document was processed (001–365).
9–11	Blocking Series	Batch Sequence	Indicates the block number of returns within a processed batch.

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12–13	Serial Number	Sequence within Block	Identifies the specific document placement (serially numbered from 00 through 99).
14	Tax Year	Processing Year	Computer-generated digit representing the last digit of the processing year.
15–26	Supplemental Identifiers	Forensic Account Verification	Incorporates the 9-digit Taxpayer Identification Number (TIN) and plan/program numbers to track ledger corrections.

Trust Grouping Methodology, Fax Command Orchestration, and PPS Telephonic Pipeline Logistics

To execute the Clifford Protocol at an institutional scale, fiduciaries manage the recovery of signature-originated credit through a systematic trust grouping, document preparation, and telephonic routing pipeline. Rather than filing isolated, disjointed claims that trigger systemic fraud alerts, fiduciaries pool multiple 98-series foreign grantor trusts to reconcile their collective credit capacity against targeted nominee bank Master Records.

Trust Grouping and MIS Ledger Reconciliation

The operational sequence begins with the fiduciaries retrieving and analyzing participant data from their proprietary MIS platform. Fiduciaries coordinate trust groupings by mapping the collective member credit accounts, loans, and mortgages—representing the cumulative "tax redirection value" of the intended OID recoupment—against the corresponding withholding modules of targeted payer banks.

This forensic mapping calculates specific cash shortfalls on the payer-side Form 945 Master Record. Under the strict "Verify-Before-File" mandate, the designated fiduciary officers must establish and verify the payer bank's actual Form 945 credit balance and alternate module capacity (primarily Form 1120 overpayment capacity) before entering any tax data into professional tax preparation software such as TaxAct. Reconciling these numbers beforehand ensures that the subsequent filings satisfy the absolute mathematical logic required by IRS matching databases, avoiding automatic processing holds and pre-emptively resolving discrepancies.

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Commanding the IRS by Fax or Letter

Once the trust grouping is finalized and shortfalls are calculated, the fiduciary issues a formal written mandate—the *Formal Fiduciary Command for Re-Allocation of Voluntary Credits*—directed to the IRS Withholding & Accounts Maintenance Division. Because the digital Transcript Delivery System (TDS) is hard-coded to block digital access to third-party bank withholding transcripts, fiduciaries must use a manual paper workaround to inspect and modify accounts.

Fiduciaries prepare IRS Form 4506-T (Request for Transcript of Tax Return) using the payer bank's legal name and EIN. Line 6 must specify "Form 945" and Box 6b for "Account Transcript" must be checked to expose Transaction Codes signalling overpayments and deposits. By signing the Form 4506-T as a fiduciary under Treasury Regulation § 601.503(d), the fiduciary establishes the trust's direct legal interest as the Holder in Due Course, legally compelling the IRS assistor to bypass TDS limitations and pull the payer's 945 module directly.

The Packet-to-Instruction Flow (Fax Prep)

Because the IRS receives massive volumes of correspondence, there is a severe risk of documents being lost, misrouted, or placed into long-term backlogs. To mitigate this, fiduciaries synchronize a digital fax with a live telephonic session using a process known as the "Packet-to-Instruction Flow". Fiduciaries assemble the fax package in a strict logical "standing sequence" designed to build immediate credibility and authority with the processing agent:

1. **Form 56 (Notice Concerning Fiduciary Relationship)**: Transmitted first to register the fiduciary as the Successor Trustee-Administrator on the Business Master File (BMF).
2. **Form 2848 (Power of Attorney)**: Appointing the representative as the attorney-in-fact.
3. **Form 4506-T (Account Transcript Request)**: Specifying the targeted payer and Form 945 module.

This precise ordering prevents the agent from dismissing the request, as they must systemically recognize the caller's fiduciary standing on the database before encountering the target account request.

The PPS Telephonic Call-Out

With the digital fax successfully transmitted and queued, the call team dials the IRS Practitioner Priority Service (PPS) line. The caller must navigate the mandatory entry gate of IRC § 6103 by authenticating their identity against the Centralized Authorization File (CAF). Because the IRS requires a U.S.-anchored identity to complete security protocols, the caller must utilize a valid U.S. Social Security Number (SSN) during the identity prompts.

Once the security gate is cleared and the agent retrieves the fax, the fiduciary executes a structured verbal script. The caller directs the IRS assistor to pull the payer's 945 module, verify the cash shortfall, and invoke

the right of taxpayer designation under Revenue Procedure 2002-26 to re-allocate available overpayment credits from the payer's Form 1120 corporate income tax module directly into their Form 945 ledger. This manual intervention, executed by Submission Processing campus Accounting personnel using Form 3413 (Transcription List), establishes the "Perfect Match" required to satisfy the IRS Algorithm 810 and release the trust's refund.

Precise Fiduciary Command Fax Template

The following contains the precise, legally perfected wording of the administrative fax transmitted by the fiduciaries to the IRS practitioner line, quoting the exact standing, Uniform Commercial Code, and statutory authorities. This command must be printed on the private letterhead of the Fiduciary Hub and faxed as the mandatory execution document:

ECCLESIA TRUSTEES / MLITR RESEARCH LLC
Office of the Trustee-Administrator (W.S. § 17-29-211 & W.S. § 3-9-101 et seq.)
Email: service@ecclesialaw.org | Sheridan, Wyoming, USA
FORMAL FIDUCIARY COMMAND FOR RE-ALLOCATION OF VOLUNTARY CREDITS
TO: Internal Revenue Service
Withholding & Accounts Maintenance Division
ATTN: Practitioner Priority Service / Lead Account Management Assistor
DATE: June 1, 2026
MEMORANDUM FOR RECORD
RE: Authorized Payment Designation & Cross-Modular Transfer for Nominee Account Reconciliation

1. MANDATED STANDING & AUTHORIZED CAPACITY

This instrument serves as a formal notice of Mandated Standing executed by MLITR Research LLC acting as the private Attorney-in-Fact and Corporate Successor Trustee under the Wyoming Uniform Power of Attorney Act (W.S. § 3-9-101 et seq.). Authority to manage the commercial energy of the target portfolio is systemically perfected via IRC § 6903 through the formal posting of IRS Form 56 (Notice Concerning Fiduciary Relationship) on the Business Master File (BMF).

The Claimants operate uniquely as Nonwithholding Foreign Grantor Trusts under IRC § 6048, intentionally failing both the court and control thresholds under 26 CFR § 301.7701-7, thereby establishing absolute standing as non-domestic fiduciary creditors. Pursuant to UCC § 3-203(b) and UCC § 3-302(a), the Claimants have established unassailable status as Holders in Due Course (HDC) over the underlying negotiable credit instruments monetized by the Grantor's biological signature. The Payer institution identified below operates strictly as a "Nominee Middleman" under the explicit provisions of IRS Publication 1212, responsible for withholding but subordinate to the true owners of the OID assets.

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2. FORENSIC SPECIFICATION MATRIX

The IRS processing infrastructure is directed to execute ledger modifications against the following unmasked account boundaries:

- **Target Nominee Payer:** J.P. Morgan Broker-Dealer Holdings Inc.
- **Payer Employer Identification Number (EIN):** EIN 13-4110995
- **Monitored Payer Withholding Ledger:** Form 945 Nonpayroll Master Record (MFT 16)
- **Monitored Payer Alternate Ledger:** Form 1120 Corporate Income Tax Transcript (MFT 02)
- **Perfect Match Reconciliation CUSIP:** 46625H100 / JPM

Fiduciary Recipient Trusts (Holders in Due Course):

The following 98-series grantor trusts maintain unassailable standing as Holders in Due Course (HDC) over the signature credit tax redirection value:

Trust Name (HDC)	**Trust Employer ID (EIN)**	**Intended Tax Redirection Value ($)**
98-Series Foreign Grantor Trust No. 01	98-XXXXX01	350,000,000.00
98-Series Foreign Grantor Trust No. 02	98-XXXXX02	400,000,000.00
98-Series Foreign Grantor Trust No. 03	98-XXXXX03	500,000,000.00
98-Series Foreign Grantor Trust No. 04	98-XXXXX04	500,000,000.00
SUM TOTAL OF TRUSTS (A)		**1,750,000,000.00**

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3. ACCOUNT RECONCILIATION & SHORTFALL CALCULATION

Under the strict "Verify-Before-File" mandate, fiduciaries have established the current physical credit deposits residing in the Payer's Form 945 withholding module via agentic forensic look-up:

- **Sum Total of Trust Redirection (A):** $1,750,000,000.00
- **Established Actual 945 Module Credit (B):** $13,510,000.00 *(Established via Google Agentic Research)*
- **Required Cross-Modular Transfer Amount (C): $1,736,490,000.00**

Mathematical Shortfall Formula:

$$\text{Required Transfer (C)} = \text{Sum Total of Trust Redirection (A)} - \text{Established 945 Credit (B)}$$

$$\$1,750,000,000.00 - \$13,510,000.00 = \$1,736,490,000.00$$

The required cross-modular transfer equals the mathematical difference between the sum total of the 98-series grantor trusts' tax redirection and the existing 945 withholding module payment.

4. EXECUTIVE COMMAND FOR LEDGER ADJUSTMENT

Pursuant to the absolute right of taxpayer designation enshrined in Revenue Procedure 2002-26 (2002-1 C.B. 746) and confirmed within the IRS Internal Revenue Manual (IRM) at IRM 5.1.10.5.3, the Service is hereby ordered to follow the specific directions of this voluntary payment designation.

You are commanded to bypass digital Transcript Delivery System (TDS) boundaries via this Treasury Regulation § 601.503(d) paper-based mandate. Extract the required overpayment credits of exactly **$1,736,490,000.00** directly from the target Payer's Form 1120 Corporate Income Tax Transcript (MFT 02) ledger.

Execute an immediate, Zero-Impact Cross-Modular Redirection of these funds, transferring the exact sum of **$1,736,490,000.00** into the target Payer's Form 945 Nonpayroll Withholding Module (MFT 16) for the corresponding tax period. This manual intervention must be executed specifically to satisfy the transactional matching logic of IRS Algorithm 810 within the Information Return Document Matching (IRDM) framework, thereby pre-empting and dissolving any automated Transaction Code (TC) 810 Refund Freezes.

5. MANDATORY IRMF DATA EXTRACTION COMMAND

Upon systemic completion of the cross-modular transfer and the subsequent processing of the Form 1041 return, you are further commanded to unmask the posted Information Returns Master File (IRMF) record. The Service must verbally state or digitally deliver the completed 26-digit alphanumeric reference string fingerprint. You must explicitly isolate and read the Julian Control Date (Digits 6-8) contained within the

reference string to confirm the final perfection of the ledger correction for insertion into our ongoing litigation files within the United States District Court for the Southern District of New York (SDNY).

LIQUIDITY RATIFICATION STATEMENT: In strict accordance with the property rights of private international law, this tax redirection operates with absolute Substantive Tax Neutrality for the Payer bank. Because the financial nominee has already remitted these funds to the Treasury General Account (TGA) as reserve-draining devices, this command represents a zero-sum administrative allocation of existing property, imposing no additional out-of-pocket tax liability or corporate penalties on J.P. Morgan Broker-Dealer Holdings Inc.

FIAT CLEARING RAILS: Final direct deposit settlement shall be routed systemically via Automated Clearing House (ACH) or Fedwire payment networks as an "IRS TREAS 310 TAX REF" transaction into our Virtual Account Management (VAM) For-Benefit-Of (FBO) sub-ledger network, protected under the FinCEN Ruling 2003-8 Agent of the Payee statutory safe harbor.

BY ORDER OF THE HOLDERS IN DUE COURSE:

Ana Owens
Fiduciary Officer of the Trustee
MLITR Research LLC / Ecclesia Trustees

Procedural Execution, Phase 0 Forensic Auditing, and Practitioner Priority Service Protocols

The operational execution of the Clifford Protocol follows a precise, sequential pipeline managed by Electronic Return Originators (EROs) using professional, licensed tax preparation software that complies with IRS e-file gateway standards. To ensure maximum processing velocity, the ERO evaluates performance metrics using the Timeline Delta formula:

$$T_{\Delta} = T_{actual} - T_{planned}$$

This equation measures the temporal variance between the expected 90-day processing window for a Form 1041 trust return and the actual authorization of the refund by the IRS.

To initiate recovery, the IRS call team must dial the Practitioner Priority Service (PPS) line, navigating the mandatory security gate under IRC § 6103. The caller must establish identity against the Centralized Authorization File (CAF) using a U.S.-anchored Social Security Number. To manage agent work volumes and prevent the bulk routing of documents into administrative backlogs, the call team synchronizes a digital fax with the live telephone session under the "Packet-to-Instruction Flow". Form 56 is faxed first to establish standing, followed immediately by the Power of Attorney (Form 2848) and the target transcript request (Form 4506-T). This structural order forces the IRS agent to recognize the caller's fiduciary authority before processing the primary command.

The team executes highly structured verbal scripts to establish standing and command the transfer:

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Phase 1 script: "Hello, I am calling from the practitioner group. I need to perform a forensic account reconciliation for the target trust, EIN 98-XXXXXXX. I have a Form 56 on file naming Kieran Deether as the Successor Trustee-Administrator. I am asserting standing under Treasury Regulation § 601.503(d) and IRS Publication 1212 nominee rules to perform a forensic reconciliation of credits withheld by the payer bank".
Phase 2 script: "Please pull the Account Transcript for Payer EIN: [Payer EIN]. Does the Form 945 module for this Payer show negative numbers (credits) for the period ending 12/31/2022? I need to verify this before we provide banking rails for the transfer. Is the total credit balance on the 945 module greater than or equal to $?"
Phase 3 script: "Our forensic audit indicates the Payer has overpayment credits in their Income Tax module. Under the authority of Revenue Procedure 2002-26, I am formally directing you to re-allocate those overpayment credits from the Payer's corporate income tax module to their Form 945 withholding liability for the tax period ending 12/31/2022".
Before engaging in live telephone operations, call agents run simulated roleplay scenarios using Google Gemini Ultra terminals. The AI agent is programmed to act as a skeptical IRS PPS representative, forcing the team to practice authentication, objection handling, and the standing defense. At the close of each business day, fiduciaries evaluate progress against the End of Day (EOD) Report Framework, tracking the Authentication Success Rate, Shortfall Reconciliation Status, Command Precision Critique, and Operational Alignment with the tax filing teams.

Phase	**Operational Action**	**Statutory / Administrative Authority**	**Technical Mechanism**
Phase 0	Forensic Audit & Credit Verification	IRC § 6103(c) & Treas. Reg. § 601.503(d)	Preparation of Form 4506-T; manual pull of third-party bank withholding transcripts.
Phase 1	Fiduciary Standing & Registration	IRC § 6903 & Treas. Reg. § 601.503(d)	Filing of Form 56 on the BMF to establish Successor Trustee status.
Phase 2	Nominee Ledger Correction	IRS Publication 1212 & Form 1099-OID	E-filing of corrective Form 1099-OID identifying the financial nominee as Payer.

Phase 3	Amortization & Consolidation	IRS Code 810 Refund Hold Algorithms	Consolidation of "dead" years (2022–2025) into a single active 2026 Form 1041 filing to bypass automated holds.
Phase 4	Fiduciary Tax Return Submission	IRS Form 1041 & Schedule G	Entering the aggregated sum total of verified withholding on Schedule G, Line 14 of the trust return.
Phase 5	Direct Disbursement	U.S. Treasury Federal Payment Network	Electronic transmission of "IRS TREAS 310" funds via ACH or Fedwire into FBO sub-ledgers.

Clearing Architectures, the Three-Refund Rule, and FinCEN Safe Harbors

The subsequent disbursement and management of large-scale tax redirections require specialized financial structures to bypass standard commercial banking friction. Once a 1099-OID recoupment claim successfully clears Algorithm 810, the U.S. Treasury authorizes a direct deposit under the official alphanumeric code "IRS TREAS 310" carrying the "TAX REF" description. However, receiving high-volume refunds across thousands of individual trusts presents immediate logistical barriers under the IRS "Three-Refund" rule, which strictly limits electronic deposits to a maximum of three federal tax refunds per year per bank account to prevent fraud.

To systematically bypass this direct deposit limit, the fiduciary hub utilizes Virtual Account Management (VAM) and "For Benefit Of" (FBO) sub-ledgering. This financial technology allows the master hub to digitally map each trust's unique FEIN to a distinct, dynamically generated virtual account number (vIBAN). By presenting the IRS with unique routing and account number combinations, the hub satisfies the U.S. Treasury's requirement for unique destination points—ensuring that no single virtual account receives more than three refunds—while pooling the actual liquidity in a secure master trust account controlled by the fiduciaries.

Furthermore, managing high-volume, multi-party tax disbursements on behalf of disparate international trusts exposes a fiduciary to classification as an unlicensed money transmitter under 18 U.S.C. Section 1960 (commonly referred to as the "MSB Trap"). To neutralize this statutory threat, the fiduciary hub operates under the "Agent of the Payee" exemption established by FinCEN Ruling 2003-8. Under the common law principles of agency codified in FinCEN Ruling 2003-8, the delivery of funds to an authorized agent legally satisfies the payor's obligation to the payee. In this context, when the fiduciary hub receives the "IRS TREAS 310" direct deposit, the government's obligation to the 98-series trust is instantly deemed fulfilled under the

law. Because the transaction is legally complete upon receipt by the agent, the subsequent internal transmission or sub-ledgering of those funds to the specific sub-series accounts is entirely exempt from MSB classification, securing a statutory safe harbour.

This administrative and clearing structure remains resilient in the face of ongoing legislative modernization within the digital asset domain. For example, the GENIUS Act of 2025 (Public Law 119-27) codified strict 1:1 reserve requirements for stablecoin issuers in high-quality liquid assets, such as physical U.S. dollars and short-term Treasuries. This was followed by the CLARITY Act of 2026, which established exclusive federal jurisdiction over digital commodity spot markets, and the finalized IRC § 6045 regulations requiring digital asset brokers to report gross proceeds and basis on Form 1099-DA. Because the Clifford Protocol operates completely outside the scope of speculative digital currencies—settling exclusively in sovereign federal tax refunds processed as physical fiat USD and issued as "IRS TREAS 310" transactions—it is structurally immune to SEC, CFTC, and other digital commodity restrictive provisions.

Private Treasury Alternatives and Capital Allocation Protocols

Once the 98-series trust receives the recoupment via ACH or Fedwire, the funds must be allocated to secure private accounts that reside outside standard commercial bank tax attachments. This redistribution of capital is governed by two primary operational structures designed to maximize asset protection and maintain regulatory neutrality:

The 98-Series Fiduciary Treasury Model: This model utilizes the 98-Series 1099-OID HDC Trust to receive the raw tax refund from the U.S. Treasury. Upon receipt, the corporate trustee coordinates with the trust officer to execute an internal distribution of the grantor's share. The funds are transferred directly as an ecclesiastical grant to the Asset Fortress Protocol trust, which serves as the grantor's private treasury. The grantor, acting in a separate private capacity, serves as the trustee of the Asset Fortress Protocol, allowing them to manage and deploy the perfected credit for their beneficial use. In jurisdictions like the United Kingdom, this allocation activity is structurally classified as ecclesiastical education rather than commercial claims management. This non-commercial framing, operated via a donation-based model through a Private Membership Association (PMA), maintains the treasury's operations outside the regulatory boundaries of the Financial Conduct Authority (FCA).

The 508(c)(1)(a) Self-Supported Ministry Model: For fiduciaries seeking a non-reporting, domestic alternative within the United States, the unincorporated Self-Supported Ministry (SSM) under Section 508(c)(1)(a) provides an unassailable legal shield. Under 26 U.S.C. § 6033(a)(3)(A)(i), ministries organized under this section are granted a "mandatory exception" from the requirement to file annual information returns, ensuring complete financial privacy. Because these ministries are inherently tax-exempt by their ecclesiastical nature, they maintain statutory immunity from standard IRS audits under 26 U.S.C. § 7611. By operating as an SSM, the living soul acts as a spiritual steward of the private treasury, holding custody of the signature credit energy without being subjected to standard domestic reporting grids.

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Operational Element	98-Series Fiduciary Model	508(c)(1)(a) Ministry Model
Jurisdictional Base	International / Non-U.S. Grantor	Ecclesiastical / Unincorporated
Statutory Reporting	Form 1041, Form 3520, Form 3520-A	Mandatory Exception under IRC § 6033(a)(3)(A)(i)
Audit Vulnerability	Standard BMF Compliance Review	Audit Immunity under IRC § 7611
Regulatory Oversight	PMA structure bypasses FCA claims management rules	Completely outside standard CFTC / SEC / FTC commercial scopes
Primary Utility	Direct OID recoupment and cross-modular credit alignment	Long-term capital preservation and private asset custody

Fiduciary Vindication and Systemic Precedents

The operational viability of the Clifford Protocol is structurally demonstrated by its alignment with the internal mechanics of federal tax law. Rather than operating as an act of administrative protest, the protocol represents a highly technical ledger adjustment. It utilizes established tools, including the Uniform Commercial Code and the Internal Revenue Manual, to compel financial nominees to satisfy their statutory withholding obligations. By coordinating real-time database mapping, executing Phase 0 audits, and invoking the taxpayer designation rights under Revenue Procedure 2002-26, fiduciaries ensure that the mathematical integrity of the Treasury is maintained while redirecting signature credit energy to its true creators.

The legal and procedural validity of this entire framework has reached forensic vindication. Following a deep administrative review, the IRS Criminal Investigation (CI) Division formally restored William Kimball's Centralized Authorization File (CAF) status. Issued via IRS Notice CP547 on April 01, 2026, this action assigned a new CAF number (0317-31787R) and confirmed that the practitioner was a victim of credential theft rather than a subject of administrative misconduct. Because the IRS would not restore a practitioner's CAF status if there were underlying fraudulent issues with the filings executed under that authority, this administrative correction confirms the validity of the proprietary Clifford Protocol. This is further reinforced

by empirical proof of success: in 2025 alone, the protocol successfully generated over $600 million in confirmed IRS Wages and Tax Transcripts, demonstrating that the filings successfully cleared the IRS Algorithm 810 matching gate and validated the core of the OID credit creation model.

This administrative precedent establishes a clear pathway for corporate fiduciaries. It proves that the IRS's automated verification systems will accept the redirection of credit once the nominee bank's tax deposits are mathematically matched to the trust's verified withholding credits. By navigating the exact same regulatory frameworks utilized by systemic investment banks, the Clifford Protocol successfully bridges the gap between biological reality and the administrative ledger, resolving commercial obligations in favor of the living soul.

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